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December 13, 2019

VIA ECF

Honorable Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Aronov
19-CR-408 (MKB)

Dear Judge Brodie:

As the Court is aware, I am counsel for Mr. Aronov in the captioned matter. As Your Honor may recall, Aronov was originally arraigned in this matter on September 29, 2019, and released on a \$500,000 secured bond, which included a condition that Aronov not participate in real estate transactions.

I write to respectfully request a modification of Aronov's bail conditions to the extent of simply prohibiting Aronov from participating in any real estate transaction involving a short sale, or a transaction involving any of the conduct or properties alleged in the Indictment. Such a modification, as previously expressed by Your Honor, will eliminate the need for transaction by transaction bail modification applications to be filed with the Court. I note that this modification is consistent with modifications Your Honor has already extended to the co-defendants in this matter.

I have conferred with AUSA Shannon Jones who advises that she maintains her standing objection to these modifications.

Thank you for your consideration.

Very truly yours,


KEVIN J. KEATING

KJK:sep
cc: AUSA Shannon Jones